## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

LITIGATION

-----

ETHICON WAVE 4 CASES LISTED IN EXHIBIT A TO PLAINTIFFS' NOTICE OF

**ADOPTION** 

Master File No. 2:12-MD-02327 MDL 2327

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## AMENDED NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE REGARDING DR. TERI A. LONGACRE, M.D. FOR WAVE 4

Plaintiffs filed a Notice of Adoption [Dkt. 3620] in the Wave 4 cases identified in Exhibit A to their Notice adopting their Motion to Exclude or to Limit the Opinions and Testimony of Terri A. Longacre, M.D. and Supporting Memorandum from Ethicon Wave 1. Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to Dr. Terri A. Longacre, M.D. for Ethicon Wave 1, Dkt. #2140. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Dated: April 27, 2017

Respectfully submitted,

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731) Thomas Combs & Spann PLLC 300 Summers Street Suite 1380 (25301) P.O. Box 3824 Charleston, WV 25338 /s/ Christy D. Jones

Christy D. Jones
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010

COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731) Thomas Combs & Spann, PLLC 300 Summers Street, Suite 1380 P.O. Box 3824 Charleston, WV 25338-3824 (304) 414-1800 dthomas@tcspllc.com